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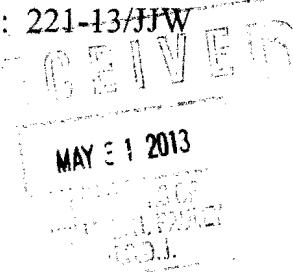
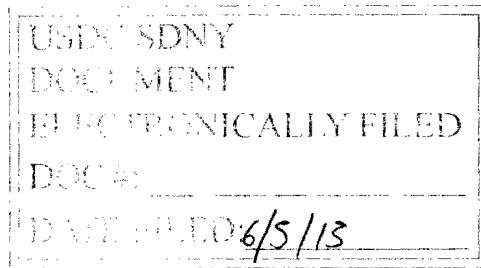
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May 31, 2013

Our Ref.: 221-13/JW



**BY HAND**

Honorable William H. Pauley III  
United States District Court  
Southern District of New York  
U. S. Courthouse  
500 Pearl Street – Room 2210  
New York, New York 10007-1312

RE: Liberty Mutual Insurance Company et al. v.  
Bouchard Transportation Co., Inc. et al.  
12 Civil 7061 (WHP)

Dear Judge Pauley:

We have just been substituted as counsel for Defendant Bouchard Transportation Co., Inc. as per the court order of May 29, 2013 in this admiralty matter involving damage to a dock in Connecticut. Upon review of the court's scheduling order, we note that all fact discovery shall be completed by May 31, 2013, which is today's date. With the consent of all counsel, we respectfully request that the Court extend the discovery dates by ninety days, as follows:

- 1) All fact discovery shall be completed by August 30, 2013;
- 2) All expert discovery shall be completed by September 30, 2013;

- 3) The parties are directed to submit a joint pre-trial order by November 27, 2013;
- 4) The parties are directed to appear for a final pre-trial conference on December 13, 2013 at 10:30 a.m.

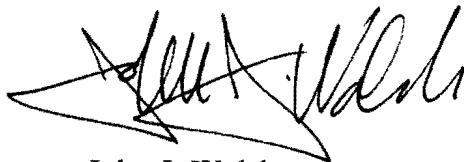
We have just been provided the file in this matter and note that it may involve some complex questions regarding the depreciation to the pier that was damaged, which may require further expert inspections, reports and depositions.

To our knowledge, this is the first request for an adjournment that has been made in this case.

To our knowledge, no formal discovery has yet been exchanged.

We thank the Court for your attention to the matter.

Respectfully,  
FREEHILL, HOGAN & MAHAR, LLP



John J. Walsh

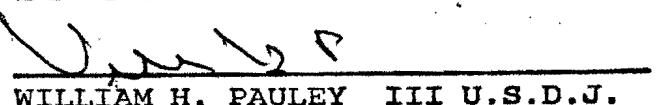
JJW:ac

cc: Via Electronic Mail  
and First Class Mail

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*Application granted.*

SO ORDERED:



WILLIAM H. PAULEY III U.S.D.J.

6/4/13

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